

Federal Communications Commission  
445 12th St., S.W.  
Washington, D.C. 20554



Unit 4  
Ocivan Way  
Margate  
Kent  
CT9 4NN

**telephone**  
+44 (0)1843 282930

**email**  
info@oceansignal.com

**web**  
www.oceansignal.com

4 September 2018

Dear Sirs,

Ocean Signal Ltd. support the petition by RTCM<sup>i</sup> for the FCC to commence rulemaking to revise regulations at 47 CFR Part 95, subpart K, to amend the reference to the RTCM Standard for Personal Locator Beacons, 11010 from version 2 to version 3, published in 25<sup>th</sup> June 2018.

The revised standard 11010.3 adds the option of AIS location capability to the PLB. AIS is a well-established location technology used in the maritime community and by maritime rescue resources. The accuracy of AIS exceeds that provided by a GPS equipped PLB through the Cospas Sarsat system and will improve time of response in a SAR situation.

Signed on behalf of Ocean Signal Ltd

Two handwritten signatures in blue ink. The first signature is "DC Sheekey" and the second is "Simon Nolan".

David Sheekey

Simon Nolan

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<sup>i</sup> Radio Technical Commission for Maritime Services (RTCM) paper 067-2018-SC110-PET

**Registration No**  
6627101

**Vat No**  
938 4374 89

**Registered Office**  
Second Floor 26-33  
Building 6000,  
Langstone  
Technology Park,  
Langstone Road,  
Havant, PO9 1SA